

MEMORANDUM ENDORSED

November 22, 2019

Via ECF

Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street – Courtroom 12C
New York, New York 10007-1312

Re: Namel Norris v. Mobile City NY 1 LLC
and Tsoumpas Sisters Inc.
United States District Court
Southern District of New York
Case No. 19-cv-03069 (GHW)

Honorable Judge Woods:

This firm represents Defendant Tsoumpas Sisters Inc. (“Tsoumpas”) in the above-referenced matter. We are writing this joint letter on behalf of Tsoumpas and Mobile City NY 1 LLC (“Mobile”) (collectively “Defendants”) with the consent of Mobile’s counsel, respectfully to request an extension of time for Defendants to answer, move or otherwise respond to the Complaint from November 22, 2019, through and including January 17, 2020, and to adjourn the Initial Pretrial Conference (the “Conference”) from December 2, 2019, at 4:30 p.m., until after January 17, 2020.

This is Defendants’ third request to extend the time to answer and to adjourn the Conference and is with the consent of Plaintiff’s counsel, although Plaintiff’s counsel was granted two (2) adjournments of the Conference [ECF #11 and ECF #13]. The Defendants’ first request to extend the time to answer and to adjourn the Conference was by letter motion dated and filed September 16, 2019 [ECF #’s 17 and 18, respectively], which the Court granted by Memo Order dated and filed September 17, 2019 [ECF #19]. The Defendants’ second request to extend the time to answer and to adjourn the Conference was by letter motion dated and filed October 16, 2019 [ECF #’s 20 and 21, respectively], which the



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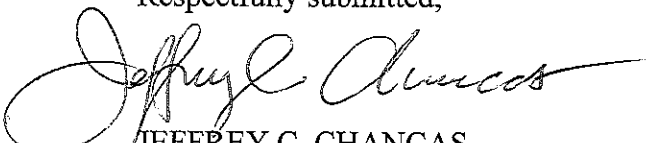
Court granted by Memo Order dated October 18, 2019, and filed October 21, 2019 [ECF #22].

This request for the extension of time for Defendants to answer the Complaint and to adjourn the Conference is being made to afford Defendants further time to investigate the allegations therein, to respond to the allegations, to obtain specifications, including the costs, from the architect and engineer regarding the modifications demanded in the Complaint, and to discuss settlement with Plaintiff's counsel. This request does not interfere with any other scheduled dates.

Wherefore, I respectfully request that the Court grant the extension of time for Defendants to file their answers to the Complaint until January 17, 2020, and the adjournment of the Conference until after January 17, 2020.

Thank you.

Respectfully submitted,



JEFFREY C. CHANCAS

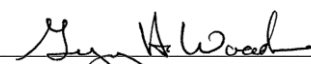
JCC:rg

Application granted. The deadline for Defendants to answer or otherwise respond to the complaint is extended until January 17, 2020. The initial pretrial conference scheduled for December 2, 2019 is adjourned until February 23, 2020 at 1:30 p.m. The joint letter and proposed case management plan described in the Court's April 15, 2019 Order, Dkt No. 7, are due no later than January 27, 2020. The parties should not expect further extensions of time.

The Clerk of Court is directed to terminate the motions pending at Dkt Nos. 23 and 24.

SO ORDERED.

Dated: November 25, 2019
New York, New York



GREGORY H. WOODS
United States District Judge